

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEBRASKA

IN THE MATTER OF:

BK NO. 19-80412

PATRICK J. WILLIAMS,

Chapter 13

Debtor.

**MOTION TO EXTEND / REINSTATE AUTOMATIC STAY FOR DURATION OF THE  
CASE**

COMES NOW the Debtor, by and through his attorney of record, and moves the Court for an order to extend or reinstate the automatic stay for the duration of this case. In support of this motion, the Debtor states and alleges as follows:

1. The Debtor filed this chapter 13 bankruptcy proceeding on March 18, 2019.

2. The debtor previously filed a chapter 13 bankruptcy on October 26, 2018. The prior Chapter 13 bankruptcy was dismissed November 20, 2018 for failure to file information.

3. There has been a substantial change in the debtor's situation, the will provide information, file and plan and make plan payments.

4. The current case is filed in good faith.

5. Pursuant to 11 U.S.C. § 362(c)(3) the debtor is requesting that the automatic stay with respect to all creditors should be extended beyond the thirty (30) days from the date of the petition and shall continue for the duration of the current case.

WHEREFORE, the Debtor respectfully moves this Court for an Order to extend the automatic stay beyond the thirty (30) days from the date of the petition and continue the automatic stay for the duration of the current case and for such other relief as the Court deems fair and equitable.

Patrick Williams,  
Debtor.

By: /s/ Wesley H. Bain, Jr.  
Wesley H. Bain, Jr.  
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 19, 2019 a true and correct copy of the Motion to Extend/Reinstate Automatic Stay was electronically filed with the Clerk of the Court, utilizing the CM/ECF system, which sent notice to Kathleen Laughlin, the Chapter 13 Trustee, and Jerry Jensen, the US Trustee; and that same was mailed by First-Class U.S. mail, postage prepaid to all the parties on the attached matrix and the Debtor.

/s/Wesley H. Bain, Jr.  
Wesley H. Bain, Jr.

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